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## **REMARKS/ARGUMENTS**

In response to the Examiner's further Office Action of April 4, 2006 issued with respect to the present application the Applicant respectfully submits the following Remarks.

## Regarding 35 USC 102(b) Rejections

It is respectfully submitted that the subject matter of pending independent claim 1 is not disclosed by newly cited Becerra et al. (US 5,675,365), for at least the following reasons.

Pending independent claim 1 clearly recites that relative skew between adjacent rows of printing nozzles on the at least one printhead module, in a direction normal to a direction of printing, is at least partially compensated for by the claimed printer controller. That is, as disclosed at page 492, line 28-page 493, line 30 of the present specification, due to construction limitations of the bi-lithic printhead it is possible that nozzle rows may be misaligned relative to each other where odd and even rows and adjacent color rows may be horizontally misaligned by up to 2 dot positions, e.g., in a direction normal to a direction of printing. The DotLine Writer Unit compensates for this horizontal misalignment, but any vertical misalignment, e.g., in a direction of printing, than can also occur is compensated for in the Line Loader Unit.

The non-perpendicular alignment of the printhead 20 disclosed by Becerra as a skew or 'head-tilt', results in a vertical misalignment of the ejectors of the printhead 20, that is in the process direction P, not a horizontal misalignment or skew in a direction normal to a direction of printing, as required by pending independent claim 1 (see col. 7, lines 33-58 of Becerra). This vertical misalignment, instead of horizontal misalignment, would remain even when multiple rows of the ejectors are used in the printhead of Becerra.

Thus, the random-access ejector activation system disclosed by Becerra (see col. 9, line 28-col. 10, line 12 of Becerra) does not compensate for relative skew between adjacent rows of printing nozzles on the at least one printhead module, in a direction normal to a direction of printing, as required by pending independent claim 1, and claims 2-18 dependent therefrom.

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## Regarding 35 USC 103(a) Rejections

It is respectfully submitted that none of the other previously cited references, Askren, Dings, Hackleman, Kamoshida, Walmsley, Silverbrook, Usui, King and Morita, teach or subject matter of pending claims 1-18 either taken alone or in combination with Becerra for at least the reasons previously discussed by the Applicant in the prosecution of the present application.

It is respectfully submitted that all of the Examiner's rejections have been traversed. Accordingly, it is submitted that the present application is in condition for allowance and reconsideration of the present application is respectfully requested.

Very respectfully,

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